

TIMOTHY D. BARROW, ESQ.  
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Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

OPEN VERANDA INC.,

: CIVIL ACTION 25-01953 – KSH - MAH

Plaintiff,

vs.

BEEONTRADE, INC.; TURKON  
CONTAINER TRANSPORT AND SHIPPING  
INC.. t/a Turkon Line, and OZAKS CAM  
ALINYUM INSAAT SAN. TIC.LTD. STI.,

STIPULATION OF VOLUNTARY  
DISMISSAL WITHOUT PREJUDICE  
PURSUANT TO FED. R. CIV. P. 41 (a)(2)

Defendants.

:

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 41(a)(2), Plaintiff OPEN  
VERANDA INC., by and through its undersigned counsel, hereby stipulates to the voluntary  
dismissal of the Plaintiff's Verified Complaint In Admiralty *without prejudice subject to the  
following Stipulation.*

IT IS ALSO STIPULATED by the Plaintiff herein, through and by its undersigned counsel,  
that any reinstatement of this action as to Plaintiff's claims shall relate back to the original filing  
date of the Verified Complaint to avoid any defense of time-bar under the Carriage Of Goods By  
Sea Act's 1 year time limit to commence suit.

s/ Timothy D. Barrow  
TIMOTHY D. BARROW, ESQ.  
Attorney for Plaintiff,  
OPEN VERANDA INC.

Dated: July 9, 2025  
Lebanon, New Jersey

SO ORDERED:

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HON. KATHERINE S. HAYDEN, U.S.D.J.  
Dated: July , 2025 Newark, New Jersey